

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)) Chapter 11
))
DIAMOND SPORTS GROUP, LLC, <i>et al.</i> ¹)) Case No. 23-90116
))
Debtors.)) (Jointly Administered)
))
DIAMOND SPORTS GROUP, LLC))
))
Plaintiff,))
))
v.)) Adv. Pro. No. 23-03135
))
JPMORGAN CHASE FUNDING INC. and))
JPMORGAN CHASE & Co.,))
))
Defendants.))
))

JOINT MOTION TO SET LITIGATION SCHEDULE

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://cases.ra.kroll.com/DSG>. The Debtors' service address for purposes of these chapter 11 cases is: c/o Diamond Sports Group, LLC, 3003 Exposition Blvd., Santa Monica, CA 90404.

Diamond Sports Group, LLC (“**Plaintiff**”) filed its complaint initiating this adversary proceeding (the “**Adversary Proceeding**”) on July 19, 2023. Summons were executed on JPMorgan Chase Funding Inc. and JPMorgan Chase & Co. (collectively, “**Defendants**”) on July 25, 2023.

Counsel for Plaintiff and Defendants have since conferred and agreed, subject to the Court’s approval, on the following proposed litigation schedule:

Date	Event
August 31, 2023	Deadline for Initial Disclosures. The deadline by which the parties must file and serve initial disclosures pursuant to Federal Rule of Civil Procedure 26.
September 19, 2023	Deadline to Answer or file Motion to Dismiss. The deadline by which Defendants must file and serve an answer to the complaint or any opening brief in support of a motion to dismiss the complaint in the Adversary Proceeding.
October 18, 2023	Deadline for Opposition to Motion to Dismiss. The deadline by which Plaintiff must file and serve any response papers in opposition to Defendants’ motion to dismiss the complaint in the Adversary Proceeding, if applicable.
November 10, 2023	Deadline for Reply in Support of Motion to Dismiss. The deadline by which Defendants must file and serve any reply papers in support of a motion to dismiss the complaint in the Adversary Proceeding, if applicable.
January 26, 2024	Close of Fact Discovery. The deadline by which all fact discovery in this case must be completed.
February 9, 2024	Deadline for Plaintiff’s Expert Reports. The deadline by which Plaintiff must serve its expert reports.
March 29, 2024	Deadline for Responsive Expert Reports. The deadline by which responsive expert reports must be served.
April 19, 2024	Deadline for Expert Depositions. The deadline by which expert depositions must be completed.

The Plaintiff and Defendants jointly request that the Court approve the above schedule by entry of an order substantially in the form of the proposed order filed contemporaneously herewith.

Dated: August 10, 2023

Respectfully submitted,

/s/ John F. Higgins

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